

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

DONIEL CARTER,

Plaintiff,

v.

Case No. 18-cv-727-bhl

ERIKA WATSON, et al.,

Defendants.

**SPECIAL VERDICT**

We, the jury, for our verdict, answer the questions submitted to us as follows:

**Question 1.** Was Defendant Watson deliberately indifferent to Plaintiff Carter's health and safety while he was a prisoner and she was a correctional officer at the Fox Lake Correctional Institution?

ANSWER: Yes ☒ No ☐

*If you answered "Yes" to Question 1, proceed to Question 2.*

*If you answered "No" to Question 1, then STOP and do not answer any more questions.*

**Question 2.** Did Defendant Weidemann fail to protect Plaintiff Carter from harm by Defendant Watson?

ANSWER: Yes ☐ No ☒

*Proceed to Question 3.*

**Question 3.** What sum of money, if any, would fairly and reasonably compensate Plaintiff Carter?

ANSWER: \$ ~~125,000.00~~ 0 *per R*

*Proceed to Question 4.*

**Question 4.** What amount of punitive damages, if any, do you find are appropriate for Defendant Watson's actions?

ANSWER: \$ 125,000.00

*If you answered "No" to Question 2, then STOP and do not answer any more questions.  
If you answered "Yes" to Question 2, then answer Question 5.*

**Question 5.** What amount of punitive damages, if any, do you find are appropriate for Defendant Weidemann's actions?

ANSWER: \$ \_\_\_\_\_

Dated at Milwaukee, Wisconsin this 4 day of November, 2021.

  
Jury Foreperson #14